

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
28th Street SW Pipeline Spill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
Final POLREP
28th Street SW Pipeline Spill
V4HO
Birmingham, AL
Latitude: 33.4584850 Longitude: -86.8779160

To: James Webster, USEPA R4 ERRPPB
Grady Springer, ADEM

From: Matthew Huyser, FOSC

Date: 4/20/2022

Reporting Period: 3/17/2022-4/15/2022

1. Introduction

1.1 Background

Site Number:	V4HO	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	3/15/2022	Start Date:	3/15/2022
Demob Date:	3/31/2022	Completion Date:	4/15/2022
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	3/15/2022
FPN#:	UCGPE22406	Reimbursable Account #:	V4HO

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

The discharge location is surrounded by industrial facilities with a residential neighborhood immediately north and downstream. The facilities consist of fuel terminals along the Kinder Morgan and Colonial Pipeline route and a trans-mix reclamation plant. The Environmental Protection Agency's Environmental Justice 2.0 Screening Tool indicates multiple overburdened and low-income communities close to the incident.

1.1.2.1 Location

The intersection of 28th St SW and Balsam Ave SW in Birmingham, Jefferson County, Alabama

1.1.2.2 Description of Threat

Oil is seeping from the ground adjacent to the road near multiple fuel storage and processing facilities. The area is perpetually wet with shallow groundwater and frequent flooding conditions. The oil was discharging into an unnamed tributary of Valley Creek. Valley Creek is a tributary of Bankhead Lake (Black Warrior River) in Central Alabama and travels through multiple residential communities.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

At approximately 12:46 CDT, the reporting party discovered fuel bubbling out of the ground and discharging into Valley Creek. Initially, the exact source of the fuel was unknown due to multiple potential sources nearby. The potential volume released is also unknown. Oil Spill Removal Organizations (OSROs) responded and have deployed containment booms in Valley Creek and have mobilized vacuum trucks to collect the oil/water mixture. The potentially responsible parties (PRP) are investigating to determine who owns the pipeline. Alabama Department of Environmental Management (ADEM) responded and requested EPA assistance. Federal On-Scene Coordinator (FOSC) and Region's 4 Superfund Technical Assessment and Response Team (START) Contractors responded to evaluate the nature and extent of contamination and ensure proper response activities from the responsible party.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On 3/18/2022, Sunoco reported that containment was lost due to heavy rains and flooding over the previous night. Containment was reestablished by 11:30 am on 3/18/2022 at the southeast corner of the intersection. On 3/19/2022 and 3/20/2022, Sunoco replaced booms and spill pads at the intersection, and by 3/20/2022, floodwater had receded so that booms in the creek could be removed. The oil at the intersection was reported to have slowed.

On 3/23/2022, ADEM visited the Site after another significant rain overnight 3/22/2022. ADEM reported that: 1) there was no longer oil seeping at the southeast corner of the intersection and no evidence of a release; 2) the trenching by the Kinder Morgan pipeline had been backfilled; 3) the storm grate in the middle of the intersection at 28th street had been cleaned out by the City of Birmingham and no longer had standing water in it; 4) the culvert underneath Balsam Ave had been cleared by the City of Birmingham; and, 5) that sorbent boom and pads had been recently replaced and were not oiled. On 3/24/2022, a representative from Citgo sent a photograph and reported that there was no standing water or oil at the southeast corner of the intersection and that the seep had stopped.

On 3/25/2022, the OSC held a conference call with the responding facilities as well as ADEM, the City of Birmingham, and Jefferson County to discuss further response measures. The OSC concurred that further spill mitigation efforts were not needed while oil was not seeping into the environment, but further investigation and response efforts may be needed following results from the USCG Marine Safety Laboratory.

On 3/31/2022, the OSC distributed results from the USCG Marine Safety Laboratory, which, in summary, concluded that: 1) all samples of the spilled oil at the intersection were similar with slightly weathered light fuel oil and a lubricating oil present; 2) none of the samples from Sunoco, Citgo, or Chevron's monitoring wells is related to the spilled oil; 3) the Chevron sump sample has a common source of the light fuel in the spill sample, but 4) the lubricating oil in the spilled samples is not a common source with the Chevron sump. From these data, the source of the lubricating oil at the corner of the intersection remains undetermined.

Also, on 3/31/2022, the OSC visited the Site, which coincided with the City of Birmingham maintenance operations to fill in the pothole at the intersection, add riprap to the north side of Balsam Ave, add asphalt to the south side of Balsam Ave, and excavate sediment from the creek on the south side of Balsam Ave. The OSC confirmed that no oil was seeping from the southeast corner of the intersection. The OSC observed a storm drain pipe from the southeast corner of the intersection to the creek on the south side of Balsam Ave, which began leaking oil when the sediment was removed. Initial observations recorded droplets with a heavy sheen but were later found to be more significant accumulations of oil consistent with the seep found two weeks prior. Sunoco provided sorbent boom and pads, which were installed in and around the outlet of the pipe. The OSC agreed with the conclusion that oil from what was thought to be the seep had accumulated in the pipe and was only released when the sediment was removed, unclogging the outlet. The OSC directed START to collect samples and then contacted the facilities and stated that further maintenance of boom and sorbent pads would be required until the oil subsides. An updated ICS 202 was requested to cover a period of 10 days; an updated ICS 202 and ICS 230 were provided by the end of the day on 3/31/2022. Sunoco and Chevron responded to inspect, replace, maintain, and dispose of the sorbent material.

On the morning of 4/15/2022, ADEM visited the Site and reported that there was no active sheen in any areas of interest, and the culvert under Balsam Ave was operating optimally. The OSC concurred that no further response measures are necessary.

2.1.2 Response Actions to Date

- Initial oily water removal by vacuum truck (Sunoco)
- Installation of containment measures
- Additional oily water removal by vacuum truck (Chevron)
- Installation and maintenance of sorbent materials
- Collection of spill and potential source samples for fingerprinting analysis and sulfur content
- Cleanout of drainage systems (City of Birmingham)
- Reinstallation and maintenance of sorbent materials

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

There are several facilities and pipelines in the area, some with historical groundwater contamination. Facilities participating and coordinating with the response include Sunoco, Chevron, Citgo, and Kinder Morgan (aka Products (SE)). Notice of Federal Interest Letters were issued to all four facilities on 3/17/2022.

2.1.4 Progress Metrics

Waste collected and disposed of by the responsible parties is not being reported back to EPA or ADEM. Two drums of oiled sorbents were observed by EPA and ADEM, and additional oily water was vacuumed by Sunoco and contractors for Chevron. Volumes of the oily water that was removed were not reported.

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2.2 Planning Section

2.2.1 Anticipated Activities

See sections 2.2.1.1 and 2.2.1.2 below

2.2.1.1 Planned Response Activities

ADEM stated that they are investigating past releases in the general area of the current incident including a former diesel pipeline incident from 2016. Any further investigation or oversight will be led by the ADEM Land Division, Groundwater Branch.

2.2.1.2 Next Steps

Facilities will coordinate maintenance of containment around oil seep or areas where oil is observed until the product is gone (COMPLETE)

- EPA and facilities will independently conduct investigation activities to determine the source of oil (COMPLETE)

- Facilities will monitor the area of concern during and immediately after pipeline receipts by terminals (COMPLETE)

- Facilities will report monitoring observations and will immediately notify EPA, ADEM, the City of Birmingham and Jefferson County if containment is breached during a rain event (COMPLETE)

2.2.2 Issues

During the response on 3/15/2022 through 3/17/2022, the facilities stated that total sulfur concentration should be used as an indicator of the source material. In addition to fingerprinting analysis by the USCG MSL, samples of the spilled oil and potential source material were sent to an analytical laboratory for total sulfur concentration. Results determined that the spilled oil at the southeast corner of the intersection had sulfur concentrations at least one to three times an order of magnitude greater than the potential sources that were sampled. Whether this increase in sulfur was due to the oil or the pooled rainwater was indeterminable. The USCG MSL analysis was considered a more reliable interpretation of the relationship between the spilled oil and the potential sources.

On 4/13/2022, the final oil sample analysis report was received from the USCG MSL regarding the samples of spilled oil collected on 3/31/2022. The report concluded that light fuel in the spilled sample was still consistent with the Chevron sump sample, but the spill contained the same lubricating oil as the original spilled oil samples, which did not match any of the potential source samples that were collected.

2.3 Logistics Section

There is no information to report in this section

2.4 Finance Section

2.4.1 Narrative

Federal Project Number UCGPE22406 was opened on 3/15/2022 in with an initial amount of \$10,000 for federal and contractor activities. The ceiling was increased to \$30,000 on 4/6/2022 and increased again to \$40,000 on 4/29/2022

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$20,000.00	\$18,000.00	\$2,000.00	10.00%
USCG MSL	\$5,000.00	\$4,448.00	\$552.00	11.04%
Intramural Costs				
USEPA - Direct	\$8,000.00	\$0.00	\$8,000.00	100.00%
USEPA - InDirect	\$7,000.00	\$0.00	\$7,000.00	100.00%
Total Site Costs	\$40,000.00	\$22,448.00	\$17,552.00	43.88%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

There is no information to report in this section

2.5.2 Liaison Officer

There is no information to report in this section

2.5.3 Information Officer

There is no information to report in this section

3. Participating Entities

3.1 Unified Command

There is no information to report in this section

3.2 Cooperating Agencies

EPA
ADEM
City of Birmingham
Jefferson County EMA
Chevron
Sunoco
Citgo
Kinder Morgan, aka Products (SE)

4. Personnel On Site

All response personnel have demobilized.

5. Definition of Terms

There is no information to report in this section

6. Additional sources of information

6.1 Internet location of additional information/report

Documents and records will be posted on response.epa.gov/28thstswpipelinespill

6.2 Reporting Schedule

There will be no further POLREPs for this Site.

7. Situational Reference Materials

There is no information to report in this section